

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

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RICHARD WAYNE WRIGHT, SR.,
Plaintiff, Pro-Se.

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SYLVESTER NETTLES, et.,al.,
Defendants.

Civil Action No. 2:05-CV-439-A-WO

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RECONSIDERATION MOTION FOR PROTECTION ORDER DUE TO

FURTHER POTENTIAL HARM UPON PLAINTIFF WRIGHT

I Richard Wayne Wright, Sr., Plaintiff, Pro-Se, submitted this (said) motion due to the continual retaliation as well as the recent confrontation faced by officer D. Pullum and defendant N. Burks 'suspected son' whom is an officer here at Ventress Correctional Facility (V.C.F.) as well, on March the 5th 2006, Sunday. Officer d. Pullum accompanied with officer Burks (B/M) (CO.I) told me to come into the hallway/lobby of the two (2) connecting dorms (8A and 8B) and told [me] an inmate informed [him] I was masturbating in the shower. I ask officer D. Pullum (B/M) (CO.I), where is the person that said I was masturbating or suspected me of masturbating I should have the opportunity to confront [him]. Officer D. Pullum (B/M) (CO.I) told me "no I don't" "I just telling you because you could get into it with some one that is thinking, if your are doing that while [their] in the shower, the shower is not the place for that". Plaintiff began to have the same similar problems with inmates here at Ventress Correctional Facility in which he had at Bullock Correctional Facility (B.C.F.) prior to the assault I faced here at (V.C.F.) and assault I faced at the hands of inmate Walton Solomon at Bullock Correctional Facility (B.C.F.). Plaintiff Wright seeks from this Honorable Court to reconsider plaintiff motion for a protection order upon defendant J.C. Giles and/or agents/Co-Worker to put plaintiff Wright in the Seg.

unit and to prevent Sgt. S. Carter, Officer R.Brown, officer L. Richardson, Officer D.Pullum--(whom is also the officer plaintiff could not identify at the time [he] was assault (4th officer) and/or officer Burks from implementing another assault upon plaintiff Wright again and/or any other agent/Co-Worker of defendant or an inmate whom might be persuaded to harm plaintiff. Plaintiff Wright is in fear of losing [his] life while in the hands of the defendants when in fact [he] was not sentence to a death penalty or life without parole. If something as serious as the assault plaintiff faced on Wednewday November the 23rd of 2005, or more so (a life thratening situation) should happen to plaintiff [I] can not expect the health care staff to properly treat [me] because the present suit fnd [their] involvement. When even at this present time I am having to bare an enormous amount of back pains and head aches while not being able to receive any pain relieving medication. Plaintiff is afraid for [his] life and it appears this Honorable Court is waiting until something else (more serious than the assault) happen to plaintiff and [his] life is lost before [it] takes some measure to perserve plaintiff life and it appears this Honorable court makes it that much mort easier for defendant to comer up [their] future inappropriate behavior and actions/assault(s) implemented upon plaintiff. Warden J.C.Giles, Warden Daryl Parker and captain Larry Monk are fully aware of the assault excuted upon plaintiff Wright on Movember 23, 2006, Wednesday at the hands of Sgt. S.Carter, officer R.Brown, officer L.Richardson (whom assisted in placing restraints/handcuffs on plaintiff before [he] was assaulted, as [he] stood back and watch and officer D.Pullum was the officer that [I] could not identify until [I] talk with Alton Jerod Carter after [I] was release from the infirmary/Seg. Unit. Plaintiff wright believes the incident mention above involving officer D.Pullum and officer Burks (defendant N.Burks suspected son) was design to intimidate plaintiff Wright just as in November on the 23rd 2005 as if its time for them to assault me again. I understand

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these prison official don't treat blacks inmates as [they] do white's inmates as if the white inmate life are more precious than those of black inmates' Plaintiff has come to the present knowledge that [he] is a descendant of Morocco born in America and should not be labeled as a 'Black', but a Moorish American (M.A,) and are entitled to the same rights of [those] free citizens which has been incarcerated for crimes aganist the dignity of this state. I believe some one told officer Richardson falsely I tried to manipulate his present wife when "really" I only had a brief discussion with [her] because [she] was called to the chapel for a problem the chaplain had created by intervening while the members of the Moorish Science Temple of America at this Facility (V.C.F.), Were conducting a bussiness meeting ment for a re-election. Other officer did assist officer Richardson (B/F) (CO.I) along with the warden and it was discovered Plaintiff did not create that problem prior to plaintiff being assaulted on November 23,2006. As plaintiff mention in a prior motion this assault mention above lead up to or derived from plaintiff Wright preperation to respond to defendant N. Burks and P.H.S. EMPLOYEES/ defendants response through [their] attorney. This is very disturbing to plaintiff Wright peace of mind and has 'NO ONE' to discuss all [my] anxieties, fears and feeling of hopelessness with, for plaintiff Wright is fully aware from past experience with the Alabama Department of Correction (here after refered to as (A.D.O.C.)) officials, Prison Health Services (here after refered to as (P.H.S)) personnel and the Mental Health Management(here after refered to as (M.H.M.)) willfully neglect plaintiff protection/safety, health care treatment that is proper and adquate, and mental health counseling absent excessive and inappropriate pyschotropic drugs. Plaintiff Wright Knows fully well now that's the only thing that [they] will do is order psychotropic drugs for plaintiff Wright was litigating the civil action case #CV-99-D-1405-N; Richard Wayne Wright, SR. -VS- James Deloach,et.,al.,instead of given plaintiff

plaintiff helpful counseling to help [him]deal with the mental agony. This Honorable Court has left plaintiff open to portential harm and has made available for (by allowing) the defendants the pooertunity to harm plaintiff again physically by not taking some measure to curve defendants and/or defendant agents/ Co-workers malicious acts and actions/assault's. Plaintiff Wright knows not when these defendants here at V.C.F. shall act sedulously again in administering excessive psychotropic drugs into plaintiff Wright Body. Plaintiff is again faced with fear this type of subjection. It is very likely that soon [these] Prison officials shall attack plaintiff again because he will not stop writing this Honorable court Concerning the issues discussed in plaintiff complaint.

Plaintiff Wright has attempted to contact the Sourtern center in Atlanta Ga. for Humane and fair treatment for inmates by writing but did not receive any response back; plaintiff wrote the internal investigation (I&I) for the Department of correction (here after refered to as (D.O.C.)) to specific personnel (ED Sasser then Eric Demus) but [I] did not receive any response. I wrote to the District Attorney (D.A.) office Bourber County but did not receive any response from them in taking any protective measures to ensure plaintiff wright Safety. The most recent assault plaintiff Wright encounter on November 23,2006, but did not receive any response from them either. I am puzzled (as to) my mail being sent to the address upon entering the mail room here at V.C.F. I am sure the Attorney General Office has knowledge of the protection plaintiff seeks by this Honorable Court sending/ forwarding plaintiff Wright mail the court Clerk receives to the attorney General and/or his assistant therefore providing knowledge of these (said0 problems mention in plaintiff complaint, as well, but as a normal pattern plaintiff has not received any respose from them in taking any protective measures to ensure plaintiff Wright safety. the most recent confrontation by officer D. Pullum and officer

Burks (M.A.)(CO.I) was another intimidating attempt when officer D. Pullum tried to get me to step into the small part of the hallway of the lobby out of sight of the on looking inmates on March 5th 2006, Sunday.

Plaintiff Wright Family members did haire a lawyer or come and see [him] on two (2) seperate occasions. the first occcation was when defendant Dowling placed [me] in the seg. unit because I refused to take another T.B. skin test after four (4) consecutive T.B.skin test within a year. And the second(2nd) occations was when I was put in seg. for the assault I faced at the hands of the A.D.O.C. OFFICIAL MENTION EARLIER. But due to the seriousness of this case as well as the complication of conbating with the Alabama Department of Correction (A.D.O.C.) officals and state attorney's none of these attornies willing assist me due to the expense as well coupled with the fight against [these] officials as stated earlier.

Here in is a copy of a threatening note I receive a few days prior to the encounter with officer D. Pullum (M.A.)(CO.I) (SEE Exhibit one (1)). When [I] received the material place on the assign bunk at B.C.F. AND TOLD Lt. Baber one of the prison officials whom took me to the infirmary about the satanic literature and notes which was in my property, but [I] never seen it again after [I] mention this to them. So [I] have decided it is best (based on past experience that I send all true items to this Honorable Court upon receipt which is relevant to the case and reveals potentional harm. I am likely to receive. Here was one form of the situation plaintiff faced unexpectedly before inmate Walton Solomon assaulted Plaintiff Wright. Plaintiff Wright was surprise when officer L. Richardson stated at the disciplinary hearing after Lt. Dowling step out of the infirmary cell/seg. unit cell [I] was housed in,"If [I] knew you would lie and say you did not assault me [I] would have beat your ass myself. I responded, "you sound like Sgt. Carter", So you might do something else too ([he] said I just might)" once Lt. Dowling re-entered the room/cell I informed [him] of what officer

[him] of what officer L. Richardson had said; Lt. Dowling (said) Richard you got to stop making up stuff like that, officer L Richardson stated(before leaving the cell) what you talking about [they] both began to laugh as [they] left. Here at V.C.F. it has stated again with the same simular threats/games plaintiff underwent at (B.C.F.). Plaintiff Wright is not messing around with any of the defendant's wives and neither have officer L. Richardson wife or any other officer wife engage in personal conversation with plaintiff Wright outside the scope of [their] job task.

CONCLUSION

A protection order being placed at the least (temporarily) against defendants/defendant's agents Sgt. S. Carter (CO.I): officer R. Brown(CO.I): OFFICER L. Richardson (CO.I); officer D.Pullum (CO.I) which plaintiff drag plaintiff Wright into the small room in front of ten (10) dorm shift office. Plaintiff humbly ask that this Honorable Court will take some form of [its'] authority to secure plaintiff Wright life and health. If this motion is not in it proper form [I] ask that it be contrued into its proper form.

Done this March 15, 2006.

RESPECTFULLY SUBMITTED,


RICHARD WAYNE WRIGHT SR. # 187140
VENTRESS CORRECTIONAL FACILITY
DORM 6A BED 29-TOP
POST OFFICE BOX 767
CLAYTON, ALABAMA 36016

CERTIFICATE OF SERVICE

This is to certify that [I] Richard Wayne Wright, Sr., Plaintiff, Pro-Se., in the above encaptioned motion and certify [I] have sent this motion to the clerk of this Court and earnestly ask due to plaintiff indigent status that this Honorable Court forward a copy of this (said) motion "Reconsideration

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Motion For Protection Order Due To Further Potential Harm Upon Plaintiff Wright" to defendant's Counsel(s) Which are as following:

TROY KING (ATTORNEY GENERAL) STATE BAR # ASB-5949-S61S STEVEN MALLETT SIRMON ASSISTANT ATTORNEY GENERAL HUGH DAVIS (ATTORNEY) ALABAMA BOARD PARDON AND PAROLES POST OFFICE BOX 302405 MONTGOMERY ALABAMA 36130	GREGORY F. YAGHMAI ASB-2411-H67G SCOTT, SULLUVAN, STREETMAN & FOX, P.C. 2450 VALLEY DALE ROAD BIRMINGHAM, ALABAMA 35244
DAVID B. BLOCK (ASB-5098-K62D) WILLIAM R. JUNSFORD (ASB-4265-L72L) DOUGLAS B. HARGETT (ASB-9928-S81H) BALCH & BIRGHAM LLP POST OFFICE BOX 18668 HUNTSVILLE, ALABAMA 35804-8668	KIM T. THOMAS GREGORY MARION BIGGS ALABAMA DEPARTMENT OF CORRECTION LEGAL DIVISION 301 RIPLEY STREET MONTGOMERY, ALABAMA 36130

by placing this (said) motion in the United States mail box at Ventress correctional Facility by (hand delivery) to the office on duty with the first class postage (stamp) prepaid and properly address this on the 15th day of March, 2006.

RESPECTFULLY SUBMITTED,



RICHARD WAYNE WRIGHT, SR., #187140
Plaintiff, Pro-Se.